

EXHIBIT 8

FST-CV-09-5011591-S : **SUPERIOR COURT**
:
RESIDENTIAL FUNDING CO., LLC. : **J.D. OF STAMFORD/NORWALK**
:
v. : **AT STAMFORD**
:
THOMAS J. LA CASSE : **DATED OCT. 8, 2014**

**DEFENDANT'S OBJECTION TO PLAINTIFF
RESIDENTIAL FUNDING'S REQUEST FOR
EXTENSION OF TIME TO RESPOND TO DISCOVERY**

Now come the Defendant Thomas J. La Casse by his counsel and having propounded both interrogatories and production dated and acknowledged by the plaintiff July 28, 2014, move for an order instructing the plaintiff to respond to the discovery requests of the defendant.

In support of this motion the defendant asserts:

1. The plaintiff has had since July 28, 2014 to respond to both interrogatories and production requests. The plaintiff has already received an extension of time to respond in this matter.
2. The plaintiff elected pursuant to *Practice Book* §13-7(a)(2) and §13-10(a)(2) to extend the time to file answers to interrogatories and to produce according to the defendant's document requests;
3. The plaintiff made no objections as required by *Prac. Bk.* §13-7(a)(4) within the thirty day period as to the interrogatories; and §13-10(b) with respect to the requirement that the plaintiff file their objections within thirty days;
4. The plaintiff has failed to file any legitimate affidavit alleging the grounds sought for an extension of time, or that the plaintiff actually attempted to engage in a legitimate discovery conference with the defendants; and
5. The plaintiff's conduct in threatening to extort further time to file impermissible objections and further delay the advancement of the pleadings is completely improper and may constitute a violation of the rules of professional conduct especially given the hot controversy being litigated both in this court and the Bankruptcy Court of the Southern District of New York.
6. This controversy is by and between Thomas J. La Casse and Residential Funding, and said interrogatories and productions requests have been directed to them, since they are presently the only party plaintiff in this action;
7. *Practice Book* §13-14 *et seq.* allows the Court to impose appropriate sanctions for discovery misconduct and to fashion appropriate remedies.

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8. The new attorney's for the plaintiff have essentially asserted that they are not representing Residential Funding Co., LLC., by the content of their email, and thus the objection of the plaintiff is moot, as the discovery is directed to the only plaintiff currently present in litigation. (The plaintiff has stated in its email that it intends to have a "substituted party" respond to these discovery requests, thus, new counsel for the alleged Plaintiff may not have the authority to bind Residential Funding and the objections may be moot).

The defendant references *exhibit A* attached to the defendant's motion for non-suit, a copy of a recent email communication the plaintiff and defendant had regarding this matter, which tends to reflect discovery misconduct.

WHEREFORE, the defendants object to the plaintiff's request for an extension of time and request the entry of an order, or the relief requested in the defendant's motion for non-suit.

THE DEFENDANT,
THOMAS LA CASSE,
BY HIS ATTORNEY,
DONALD M. BROWN

/ss/ 421865 _____
Donald M. Brown, Esq.
Juris No. 421865

The following objection having been heard, it is hereby ORDERED:

SUSTAINED / OVERRULED

A Judge of the Superior Court

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CERTIFICATION

I hereby certify that a copy of the foregoing and within Objection was mailed first class postage prepaid to the plaintiff on Oct. 8, 2014 at the following address:

MARISSA I DELINKS
28 STATE ST 24TH FLR
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VALERIE NICOLE DOBLE
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/ss/ 421865 _____
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